



## **Code of Conduct for SCSH Participating Contractors & Inspectors**

SCSH will not tolerate any retaliation against anyone who makes a good faith report of a suspected violation of a law, regulation, policy or this Code, or who cooperates in the investigation of such a report. Suspected or alleged retaliation must be reported so that SCSH has an opportunity to consider and address it as appropriate. As with any concerns under this Code, you can report suspected retaliation to any of the SCSH staff.

### **ABOUT THIS CODE OF CONDUCT & YOUR RESPONSIBILITIES**

SC Safe Home has chosen to contract with you to provide products or services, either directly to the SCSH or to the individuals we serve. As part of your agreement, SC Safe Home expects you to follow applicable laws, rules and regulations and this Code of Conduct in performing your responsibilities. It is essential that you take time to read and understand this Code so you can:

- Render contracted services in a manner that is consistent with SCSH values and principles
- Know and follow ethical business practices
- Understand your responsibilities and contractual obligations to the individuals to whom we provide services
- Know when and how to bring to SCSH's attention possible violations of this Code or questions about it
- Acknowledge that you have received and read this Code

In addition to this Code, there may also be other documents you need to refer to and rely on when providing services under your agreement with SCSH.

It is your responsibility to be familiar with all the standards that govern the services you provide to or under agreement with SCSH.

To whom does this Code apply?

This Code applies to anyone who provides contractual services to SC Safe Home and/or the individuals served by SCSH and is not an employee of the SCDOI. This includes, for example, vendors, contractors, subcontractors or independent contractors of SC Safe Home.

How do I acknowledge that I read the Code?

As a condition of your agreement with SCSH to provide products or services, you are expected to read this Code, acknowledge that you have received and read this Code and agree to abide by its provisions. In addition, to be eligible to continue contracting with SCSH, from time to time you may be asked to participate in a compliance awareness refresher.

Where can I find the Code online?

This Code appears on our department's website, [www.scsafefhome.com](http://www.scsafefhome.com), so everyone with an interest in SC Safe Home has access to our values and principles.

How will I know if changes are made to the Code?

Updates to this document will be circulated in the manner SCSH deems to be most timely and effective for the specific circumstances, and a new acknowledgement may be required at that time.

What happens if I violate the Code?

Suspected violations of this Code or any provisions of your agreement with SCSH will be reviewed and addressed as appropriate. When a violation of the Code or your agreement has been identified, it may constitute a breach of your agreement with SCSH. This may lead to termination of your participation in the SCSH program, and/or referral for criminal prosecution or civil action if appropriate.

Where can I ask questions or report concerns?

If you have any questions about this Code, or wish to report a possible violation of the Code, you may report your concern to a SCSH staff member via phone or email.

## **ABIDE BY APPLICABLE LAWS, REGULATIONS AND CONTRACTUAL REQUIREMENTS**

It is your responsibility to ensure that you follow the laws and regulations that apply to the services that you provide to or under agreement with SCSH. It is a requirement of your agreement with SCSH to be familiar with these requirements and to follow them. You are also responsible to file accurate and timely reports, documentation, invoices and other documents as required by your agreement.

### **RECORD KEEPING**

From time to time there may be an audit or inquiry by SCSH. It is expected that you will cooperate with any reasonable request made about an audit or inquiry. SCSH reserves the right to discontinue its relationship with any contractor who refuses to provide requested information or provides false information to SCSH or to the individuals we serve.

### **REFERRALS**

The Company expects that you will not accept, offer or participate in any fraud, kickbacks, bribes or other arrangements designed to induce referrals or business.

### **CREDENTIALS, LICENSING AND INSURANCE**

If your agreement with SCSH requires that you have a credential or license, it is up to you to maintain that credential and/or license, and you must inform SCSH immediately if your credential or license becomes encumbered or restricted or is not renewed or maintained. When a required credential or license is renewed, you should provide a copy to SCSH. Contractors are responsible for ensuring that any employees assigned to perform services under the agreement with SCSH follow applicable federal and state employment and immigration laws and licensing requirements, and obtain and maintain all appropriate insurances (e.g., liability, workers' compensation) for their workforces.

## BACKGROUND CHECKS

Prior to delegating your work to or entering into an agreement with an individual we serve, SCSH reserves the right to conduct a background check to ensure that the individual performing the contracted for services has the appropriate credentials. We also confirm that the individual is not precluded from providing services to SCSH because of, for example, a disqualifying criminal record.

SCSH may periodically check the names of contractors and/or inspectors to ensure the safety and quality of the individuals and services we provide. If an individual or organization is confirmed to be unlawful, we will have no choice but to terminate our contractual relationship immediately.

## MAINTAIN FINANCIAL INTEGRITY

Every approved contractor and/or inspector is expected to conduct business on behalf of SCSH with integrity, honesty and high moral standards. This includes truthfulness in billing, accounting, and financial reporting practices. SCSH expects that you will document and bill accurately for services that are provided, and to comply with all laws and regulations related to documentation and billing practices. At times, SCSH or an individual we serve may request to audit or review records in the ordinary course of business or in response to a reported concern. SCSH expects that you will cooperate if any such audit or review requires your documentation or other records. The False Claims Act is a federal law that permits the government to recover funds paid for services if the Company or its representative submitted a false claim for reimbursement. You should know that any person who files, causes another person to file or otherwise cooperates with the preparation of a false claim for payment to any government program may be charged with a criminal offense under the False Claims Act. Thus, if you become aware that part or all of any invoice may have been misstated you must immediately notify a SCSH program contact.

## MAINTAIN CONFIDENTIALITY

You are likely to be provided with confidential and/or private information about the individuals SCSH serve. (In this Code we are collectively referring to all of this as “Confidential Information.”) There are many laws and regulations, including state laws and the federal, that protect the privacy of this information. It is your responsibility to understand and follow these requirements and report any improper disclosure to your SCSH program contact immediately. As with any issue under this Code or your agreement with SCSH, you should talk to your SCSH program contact if you have any questions or concerns about the disclosure of Confidential Information. The following are some of the requirements you must follow regarding confidentiality in your relationship with SCSH:

- You must not disclose or use Confidential Information for any purpose other than to provide services to or under agreement with SCSH. This means that you should not share Confidential Information you receive about the SCSH individuals we serve with anyone outside SCSH.
- Information regarding individuals receiving services from SCSH is confidential and may be shared only in accordance with appropriate and specific authorization.
- You should take care not to discuss Confidential Information about the individuals we serve in public or in areas where others can overhear.

- You should not speak on behalf of SCSH in any public forum (including Internet blogs and chat forums) or to any media outlet. This does not limit your ability to speak publicly using only your name on issues related to yourself and the work you do.
- Any written Confidential Information should be maintained appropriately and not visible to anyone without a right (i.e. appropriate and specific release) to know the information.
- You should not post on the Internet (including any social networking site) any names or photographs/videos of individuals to whom you provide services on our behalf without specific written authorization from the individual.
- You should not email Confidential Information to anyone unless it is encrypted. Where you must send unencrypted information electronically, you should not use any names of individuals served by you or SCSH (you may want to use initials, for example).
- You should password-protect any electronic documents containing Confidential Information that you store on or access from your computer. Inappropriate disclosure of Confidential Information could lead to termination of your agreement with SCSH, as well as possible legal action. If there is an unauthorized disclosure of Confidential Information, you should immediately inform your SCSH program contact.

## **PROVIDE QUALITY SERVICES**

SCSH is committed to providing quality services and expects contractors and/or inspectors providing services under agreement with SCSH to meet our expectation that every individual we serve, regardless of age, complexity of condition, service type, or setting in which the services are provided, can expect to be treated with respect and dignity always.

## **MAINTAIN A SAFE AND HEALTHY ENVIRONMENT**

SCSH expects its contractors to provide a safe and healthy environment while providing services in the homes of the individuals we serve.

### **DRUGS AND ALCOHOL**

It is expected that there will be no unlawful use of drugs or alcohol in any location where services are provided to SCSH or the individuals we serve.

## **DISCRIMINATION PROHIBITED**

SCSH provides services that are non-discriminatory to individuals regardless of race, ethnicity, national origin, age, gender, sexual orientation, religion, disability, medical condition, socioeconomic status, or any other status that may be protected under applicable law. Any incident or situation that you believe involves possible discrimination should be brought to the immediate attention of your SCSH program contact.

## RESOLVE CONFLICTS

We strive to have open communication and address problems in a mutually respectful way, considering individual situations.

### PROMOTE A DIVERSE AND RESPECTFUL WORK ENVIRONMENT

When you are working under agreement with SCSH, you are expected to be sensitive to the concerns, values and preferences of others, and behave in a manner that supports and promotes a diverse and respectful environment.

### AVOID AND DISCLOSE POTENTIAL CONFLICTS OF INTEREST

You should avoid any actions that may involve, or may appear to involve, a conflict of interest with the products or services you provide to or under agreement with SCSH. You should disclose to your SCSH program contact any situation where a conflict of interest may arise involving you or your immediate family. A conflict of interest may arise when you or someone you associate with in your independent business:

- Allow private interests, whether personal, financial or of any other sort, to conflict or appear to conflict with your professional responsibilities.
- Are a party to any other arrangement or circumstances, including family or other personal relationships, which might appear to or influence your behavior.
- Solicit or offer to provide services yourself or through your family member to an individual you provide services to under your agreement with SCSH. Contractors and/or inspectors must avoid conflicts of interest with the individuals they provide services to.

Potential conflicts can usually be resolved by using good judgment. You are encouraged to seek clarification of, and discuss questions about, potential conflicts by talking to your SCSH program contact.

### DECISION TEST

The following questions provide a good guideline for those in doubt about a specific course of conduct:

1. Will my actions be ethical in every respect?
2. Will my actions fully comply with the law and my agreement with SCSH?
3. Will my actions be questioned by my peers, family or the general public?
4. How would I feel if my actions were reported in the newspaper?
5. How would I feel if someone else acted in the same way?
6. Will my actions appear to be proper?
7. Will my actions be seen as fair?

## GIFTS AND GRATUITIES

It is the SCSH's position that neither we nor anyone with whom we do business gives, solicits or receives gifts or gratuities which are or appear to be in exchange for personal or professional advantage or gain. Reasonable small tokens from or to a third party may be acceptable, provided that they do not place you or the other party under any obligation, are not frequent, and would not be misconstrued by a reasonable person as a bribe.